



Response Submitted Via Email to: [Brown.Dorothy@epa.gov](mailto:Brown.Dorothy@epa.gov); [Okpala.Maria@epa.gov](mailto:Okpala.Maria@epa.gov)

## NPDES Permit Application No. TX0074012, Bryan Mound SPR Oil Storage Response to the Request for Additional Information

### Information Requested:

1. Discharges from Outfall 001 include brine and associated salt-containing wastewaters into the Gulf of Mexico through a diffuser section located at the end of a permitted cement-lined brine disposal pipeline. The daily average TSS concentration reported in the NPDES application is 445.8 mg/L with a maximum concentration of 852 mg/L. Please clarify the source of TSS concentration in the brine and associated salt-containing wastewater.

### Response:

The source of TSS is from the salt that is suspended in the brine solution. In addition, a review was completed from the 2014 permit renewal application and the TSS concentration has decrease since that reporting period. In 2014, the TSS concentrations had a daily average of 847.9 mg/L with a maximum concentration of 1512 mg/L a reduction of 62.2% and 55.8 % respectively.

### Information Requested:

2. 40 CFR 122.21 (g)(7) requires that the facility provide the effluent characteristics from all listed outfalls. The facility should provide effluent data for the respective Outfalls for those parameters that are present in its effluent. At least three data results are needed of each parameter believed present. These samples should be taken at least one week apart. The facility should provide effluent characteristics for Fecal Coliform which was marked believe present in the application for Outfall 002. Similarly, oil & grease was marked believed present for outfalls 003,005, and 005, but no data were submitted.

### Response:

Fecal Coliform was marked believe present because the discharge is from a Sewer Treatment Plant, which there may be a presence of Fecal Coliform. The site's previous and current NPDES permits do not include Fecal Coliform as an outfall parameter so, the SPR will pull three samples for Fecal Coliform as requested in the letter dated 08/02/19. However, we did not receive the letter until 8/9/19 so, we are requesting an extension until September 9, 2019 to provide a full set of analytical results to the USEPA.

Outfalls 003, 004, and 005 were marked believe present for oil & grease only due to the potential of oil & grease being present on the well pads. The data was reviewed for the entire 2018 reporting period and all results for Oil & Grease for outfalls 003, 004, and 005 were below the detection limit.



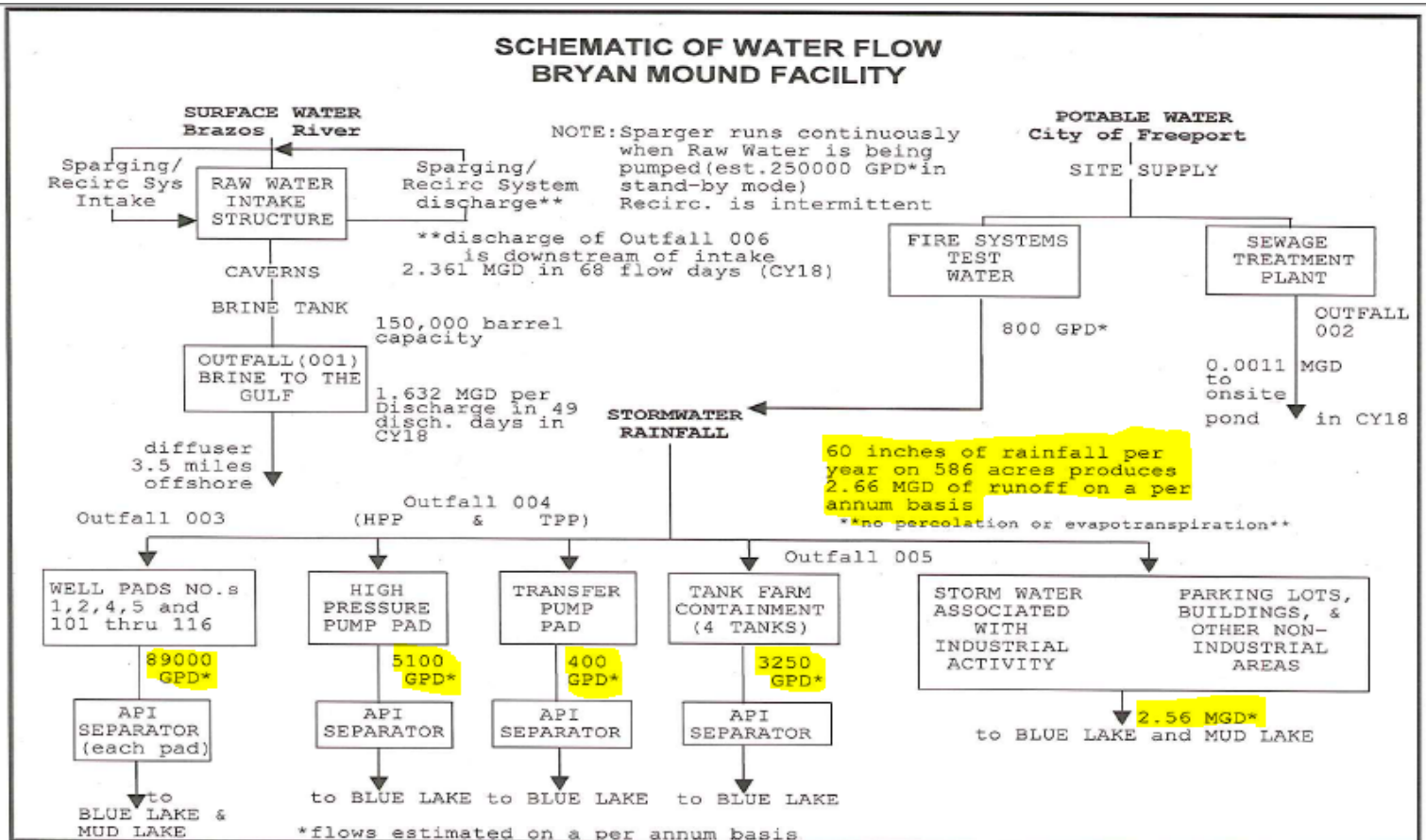
## NPDES Permit Application No. TX0074012, Bryan Mound SPR Oil Storage Response to the Request for Additional Information

### Information Requested:

3. Please clarify why flow was marked as “N/A” for Outfalls 003, 004, and 005.

### Response:

Flow is not a parameter on the current NPDES permit, as these discharges are primarily from stormwater. Please review the below schematic in which an estimated rainfall and flow amounts are given for 2018.





## NPDES Permit Application No. TX0092827, Big Hill SPR Oil Storage Response to the Request for Additional Information

### Information Requested:

1. 40 CFR 122.21 (g)(7) requires that the facility provide the effluent characteristics from all listed outfalls. The facility should provide effluent data for the respective Outfalls for those parameters that are present in its effluent. At least three data results are needed of each parameter believed present. These samples should be taken at least one week apart. The facility should provide effluent characteristics for Fecal Coliform which was marked believe present in the application for Outfall 004. Similarly, oil & grease was marked believed present for outfalls 001, 002, 003, 005, 006, 007 and 008, but no data were submitted.

### Response:

Fecal Coliform was marked believe present because the discharge is from a Sewer Treatment Plant, which there may be a presence of Fecal Coliform. The site's current NPDES permit does not include Fecal Coliform as an outfall parameter so the SPR will pull three samples for Fecal Coliform as requested in the letter dated 08/02/19. However, we did not receive the letter until 8/9/19 so, we are requesting an extension until September 9, 2019 to provide a full set of analytical results to USEPA.

Outfalls 001, 003, 005, 006, 007 and 008 were marked believe present for oil & grease only due to the potential of oil & grease being present on the well pads. The data was reviewed for the entire 2018 reporting period and all results for Oil & Grease for all the above outfalls were below the detection limit.

Outfall 002 is an inactive outfall.



## NPDES Permit Application No. TX0092827, Big Hill SPR Oil Storage Response to the Request for Additional Information

### Information Requested:

2. Please clarify why flow was marked as "N/A" for Outfalls 003, 005, 006, 007 & 008.

### Response:

Flow is not a parameter on the current NPDES permit, as these discharges are primarily from stormwater. Please review the below schematic in which an estimated rainfall and flow amounts are given for 2018.

